

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

JUSTIN JONES,

*Plaintiff,*

v.

RICHMOND AUTO AUCTION OF  
VIRGINIA, INC.,

*Defendant.*

Civil Action No. 3:23-cv-626

**DECLARATION OF CHARLES WYATT CARTER**

Charles Wyatt Carter, under penalty of perjury pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am over the age of 18 and am otherwise competent to make the statements set forth in this Declaration. The statements made in this Declaration are based on my personal knowledge.

2. I am General Manager of Richmond Auto Auction, Inc. ("RAA").

3. Justin Jones ("Jones") is a former employee of RAA who has filed suit against RAA.

4. Jones, proceeding without a lawyer, has led a campaign of harassment and intimidation against non-parties and potential witnesses in this case.

5. On September 27, 2023, Jones either wrote himself, or had somebody else write on his behalf, a Facebook message to my wife. (Exhibit 1). My wife is not employed with RAA. On a Facebook profile with the name "Les Baker," Jones or his agent made the following statement: "Tell your shitty husband to pay my brother. I heard all about it and if he loses his house, you lose yours too." While I am unfamiliar with the name "Les Baker", the Facebook message contained the same spelling mistake ("loose"/ "loosing") that was also in letters Jones placed on the windshields of cars of RAA employees and customers on RAA's business premises the previous week. (Exhibit 2).

6. On or around October 9, 2023, Jones visited the home premises of RAA's owner and CEO, as well as RAA's business premises and the office of RAA's attorneys, to deliver Notices of Subpoena, despite having received clear warnings not to trespass in previous incidents.

7. RAA then filed a Motion to Quash with the Court.

8. In the Motion to Quash, a copy of which it sent to Jones, RAA requested that Jones should stop his efforts to contact RAA or its employees directly. RAA also repeated its previous warnings about trespass.

9. Jones has a history of violent criminal conduct, which includes guilty pleas for grand larceny from the person, unlawful wounding, and stalking.

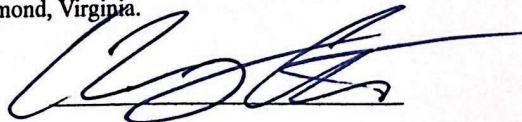
10. On October 11, 2023, Jones visited the personal residences of four RAA employees (hereinafter John Doe 1 and 2 and Jane Doe 1 and 2) to deliver "Notices to Preserve Evidence" (Exhibit 3) at their home addresses by taping the notices to their front doors and placing copies on their cars' windshields. In these Notices, Jones identifies himself as the person leaving the notice, and tells the recipients they are named as witnesses and will be subpoenaed to testify.

11. The placement of these Notices at our employees' homes alarmed John Doe 1 and 2 and Jane Doe 1 and 2, who were unaware that Jones knew their home addresses, but were aware of his criminal conviction for stalking, causing fear of death. These employees are intimidated by Jones and are afraid that he will do something to cause them harm if they do not testify in his favor.

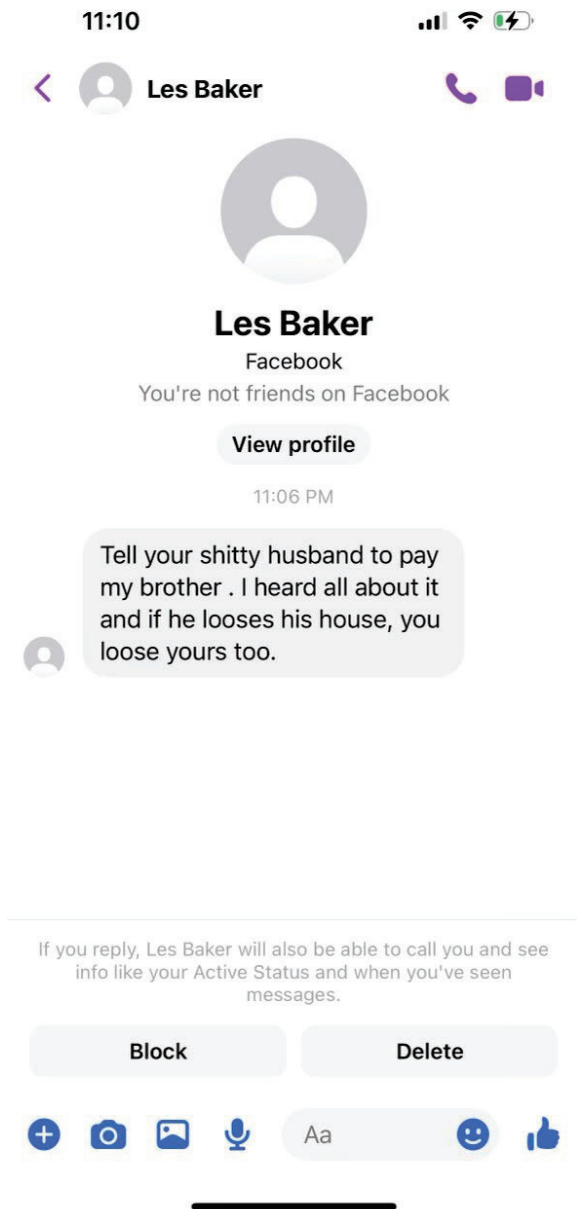
12. On October 11, 2023, I received a text message from an unknown cell phone number. (Exhibit 4). The text message, which I believe to have come from a "burner" cell phone owned by Jones, contained only my home address. I messaged back for the sender to identify himself but received no response.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 11, 2023, in Richmond, Virginia.



Charles Wyatt Carter





**ATTENTION**

**EXHIBIT**

**2**

I was relieved of my duties at Richmond Auto Auction of Virginia, INC for:

1. Disclosing fraudulent and inaccurate charges and fees applied to customer and client accounts for keys, batteries, repairs and lot damage.
2. Requesting unpaid wages.
3. Requesting agreed hourly rate
4. Requesting training
5. Mark Motley has returned no emails, texts or phone calls prior to or after my termination despite the numerous requests to resolve issues internally regarding unfair compensation, discrimination and unpaid wages.

**Due to this, I am at jeopardy of losing my home and assets due to non-employment and I ask that you please do one of the 3 BELOW:**

1. Temporarily boycott Richmond Auto Auction and request that he devote time to resolve this matter and any other employee related matters.

2. Send employment offer leads that you may have or may know of to:

**EMRJ00@ICLOUD.COM**

3. Text or call 208-231-7340 for instructions with how to donate DIRECTLY to a verified fundraiser with GO FUND ME to support this cause and any attorney(s) fee(s) associated with this matter.

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RICHMOND DIVISION



JUSTIN JONES

PLAINTIFF,

vs.

RICHMOND AUTO AUCTION OF

VIRGINIA, INC

DEFENDANT,

)

)

)

) CIVIL ACTION NO. 3:23CCV626

) HONORABLE JUDGE H.L.

)

) **NOTICE TO PRESERVE**

) **EVIDENCE**

)

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PLEASE TAKE NOTICE; You have been listed as a witness to the Civil Action  
**3:23CCV626**. Please preserve any and all information relevant to this matter. Please take  
further note that, you will be Subpoenaed to testify at a Deposition Hearing at the earliest  
date made available.

Date

10/10/2023

  
Justin Jones pro se, Attorney for Counsel

804-263-3773

12:17



+1 (804) 724-5134 >

Text Message  
Today 12:05 PM

[REDACTED] Henrico, VA  
23233

Who is this?

What's up with the address?



Text Message

